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15
                     UNITED STATES DISTRICT COURT FOR THE
                         CENTRAL DISTRICT OF CALIFORNIA
16
                              (Western Division-Los Angeles)
17
                                            CASE NO. CV 08-3336 DDP (AGRx)
     KEVIN SO,
18
                                            PLAINTIFF'S NOTICE OF ERRATA
                       Plaintiff,
                                            RE DECLARATION OF D.
19
                                            MICHELLE DOUGLAS IN SUPPORT
                                            OF OPPOSITION TO MOTION FOR
     ٧.
20
                                            SUMMARY JUDGMENT FILED BY
                                            DEFENDANTS UNIVEST AND
21
     LAND BASE, LLC, et al.
                                            JEFFREY MORITZ
                       Defendants.
22
                                            (Hon. Dean D. Pregerson)
23
    TO THE HONORABLE COURT AND ALL PARTIES AND THEIR COUNSEL OF
    RECORD:
25
26
          PLEASE TAKE NOTICE THAT Plaintiff Kevin So is filing herewith a
27
    Supplemental Declaration of D. Michelle Douglas which is intended to replace the
28
     Notice of Errata Re Declaration of D. Michelle Douglas in Support of Opposition to Defendants
          Univest and Moritz's Motion for Summary Judgment or Judgment on the Pleadings
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following declaration: Declaration of D. Michelle Douglas in Support of Plaintiff's Opposition to Defendants Univest and Moritz's Motion for Summary Judgment (See Docket 382). The reason for the substitution is twofold. First, the Declaration of Birui Wang, attached to the original Douglas Declaration as Exhibit B and referenced at Paragraph 4, was missing Page 2. A full and complete copy is attached to the supplemental Douglas Declaration. Second, the original Douglas Declaration noted that Exhibits J through S were uncertified copies but that counsel would replace those with certified copies as soon as they were received from the Clerk of the U.S. District for the Eastern District of Kentucky. Plaintiff has now received those certified copies, and provides them with the supplemental Declaration.

For the Court's convenience, all other exhibits have been attached to the supplemental Declaration so that this version can be substituted for the original Declaration *in toto*.

15 Dated: June 23, 2010

KALBIAN HAGERTY, LLP

/s/ D. Michelle Douglas

D. MICHELLE DOUGLAS (CA Bar No. 190248) Counsel for Plaintiff Kevin So

¹ Please note that Paragraph 4 of the original Douglas Declaration inadvertently refers to the Wang Declaration as Exhibit A, but this is a typographical error. The supplemental Declaration correctly refers to the Wang Declaration as Exhibit B.

CERTIFICATE OF SERVICE

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2 I am employed in the District of Columbia; I am over the age of eighteen years and not a party to 3 the above-entitled action; my business address is 888 17th Street, NW, Suite 1000, Washington, DC 20006. 4 5 I hereby certify that on the date set forth below, I have electronically filed the foregoing: Notice of Errata Re Declaration of D. Michelle Douglas in Support of Opposition to Defendants Univest and Moritz's Motion for Summary Judgment or Judgment on the Pleadings; Supplemental 7 Declaration of D. Michelle Douglas 8 with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing 9 (NEF) to the following: 10 Wayne E. Beaudoin, Esq. Thomas W. Dressler, Esq. Dennis M. McPhillips, Esq. The Law Offices of Wayne Beaudoin 11 Dressler Law Group 15165 Ventura Boulevard, Suite 400 707 Wilshire Blvd., Ste. 3700 Sherman Oaks, California 91403 Los Angeles, California 90017 Attorney for Defendant Mira Meltzer Attorneys for Defendants Univest Financial 13 Services, Inc., Jeffrey M. Moritz and Laurent William Donovan, Esq. Gerschel. 14 Brendan E. Starkey, Esq. DLA Piper LLP (US) Todd D. Thibodo, Esq. 15 1999 Avenue of the Stars, Fourth Floor Law Offices of Todd D. Thibodo Los Angeles, California 90067-6022 16133 Ventura Boulevard, Suite 580 16 Attorneys for Defendant Kevin Kondas Encino, California 91436 Attorney for Defendants KM & Associates 17 John P. Hannon II, Esq. International LLC, KB&M Associates International LLC, and CTL Projects Law Offices of John P. Hannon II 18 International, LLC 716 Capitola Avenue, Suite F Capitola, California 95010 19 Attorney for Defendant Charles W. Woodhead 20 I hereby certify that I served via U.S. Mail, postage prepaid, the documents identified above on 21 the following non-efiling user(s): 22 Boris Lopatin 23 Land Base, LLC 1431 Ocean Avenue, # 1210 24 Santa Monica, CA 90401 25 Dated: June 23, 2010 KALBIAN HAGERTY, LLP 26 /s/ D. Michelle Douglas 27 D. MICHELLE DOUGLAS (CA Bar No. 190248) Counsel for Plaintiff Kevin So 28 Plaintiff's Opposition to Motion for Summary Judgment Filed by Defendants

Univest and Jeffrey Moritz